

# Exhibit 1

**Optimum Imaging Technologies LLC v. Fujifilm Corp. et al.: Draft Proposed Schedule**

Court Proposed Deadline	Event	Joint Proposed Date	OIT Proposed Date	Defendants Proposed Date
<b>Rule 26(f) attorney conference</b>	Rule 26(f) Attorney Conference	August 22, 2024		
<b>Motions to Transfer</b>	Deadline to file Motions to Transfer	August 29, 2024		
<b>Joint Case Management Report</b>	Joint Report from Rule 26(f) Conference	September 10, 2024		
<b>To be discussed at Mgmt. Conf.</b>	Scheduling Conference  Mediation. The Court will discuss appointing a mediator at the Scheduling Conference.	September 19, 2024		
<b>10 days after Mgmt. Conf.</b>	P.R. 3-1 Disclosure of Asserted Claims and Infringement. Contentions (and P.R. 3-2 document production) to be served.	September 27, 2024		
<b>5 weeks after Mgmt. Conf.</b>	Join Additional Parties	October 24, 2024		

Court Proposed Deadline	Event	Joint Proposed Date	OIT Proposed Date	Defendants Proposed Date
<b>5 weeks after Mgmt. Conf.</b>	P.R. 3-3 Invalidity Contentions (and P.R. 3-4 document production) to be served. To extent not already required to be disclosed, exchange Initial Disclosures and Mandatory Disclosures on all issues, including damages.	December 4, 2024		
<b>No later than 45 days after Mgmt. Conf.</b>	Parties to exchange proposed terms for construction and identify any claim element governed by 35 U.S.C. § 112, ¶ 6 (P.R. 4-1).	December 9, 2024		
<b>7 weeks after Mgmt. Conf.</b>	Privilege Logs to be exchanged by parties.	December 4, 2024		
<b>No later than 65 days after Mgmt. Conf.</b>	Parties to exchange preliminary proposed claim construction and extrinsic evidence supporting same (P.R. 4-2).	December 20, 2024		
<b>13 weeks after Mgmt. Conf. (A motion for leave is required.)</b>	Parties' Final Amended Pleadings	December 19, 2024		

Court Proposed Deadline	Event	Joint Proposed Date	OIT Proposed Date	Defendants Proposed Date
<b>No later than 95 days after Mgmt. Conf.</b>	Joint Claim Construction and Prehearing Statement to be filed (P.R. 4-3). Provide an estimate of how many pages are needed to brief the disputed claims.	January 10, 2025		
<b>16 weeks after Mgmt. Conf.</b>	Respond to Amended Pleadings	January 9, 2025		
<b>No later than 125 days after Mgmt. Conf.</b>	Completion date for discovery on claim construction (P.R. 4-4).	January 31, 2025		
<b>No later than 125 days after Mgmt. Conf.</b>	Plaintiff shall serve a Preliminary Election of Asserted Claims, which shall assert no more than ten claims from each patent and not more than a total of 32 claims.		Plaintiff does not agree with adding this deadline or using the Model Order Focusing Patent Claims and Prior Art. Neither the Local Patent Rules nor the Court's Appendix B include this limitation.	January 31, 2025  This deadline is from the Court's Model Order Focusing Patent Claims and Prior Art and the Asserted Patents include over 100 patent claims.
<b>No later than 140 days after Mgmt. Conf.</b>	Plaintiff's Opening claim construction brief (P.R. 4-5(a)).	February 7, 2025		

Court Proposed Deadline	Event	Joint Proposed Date	OIT Proposed Date	Defendants Proposed Date
<b>2 weeks after Preliminary Election of Asserted Claims</b>	Defendants shall serve a Preliminary Election of Asserted Prior Art, which shall assert no more than twelve prior art references against each patent and not more than a total of 40 references		Plaintiff does not agree with adding this deadline or using the Model Order Focusing Patent Claims and Prior Art. Neither the Local Patent Rules nor the Court's Appendix B include this limitation.	February 14, 2025  This deadline is from the Court's Model Order Focusing Patent Claims and Prior Art and the Asserted Patents include over 100 patent claims.
<b>4 weeks before claim construction hearing</b>	Submit technology synopsis/tutorial (both hard copy and disk).	February 14, 2025		
<b>No later than 2 weeks after claim construction brief.</b>	Defendant's Responsive claim construction brief (P.R. 4-5(b)).	February 21, 2025		
<b>No later than 7 days after response</b>	Plaintiff's Reply claim construction brief (P.R. 4-5(c)).	February 28, 2025		
<b>At least 10 days before claim construction hearing</b>	Parties to file joint claim construction and chart (P.R. 4-5(d)).	March 4, 2025		

Court Proposed Deadline	Event	Joint Proposed Date	OIT Proposed Date	Defendants Proposed Date
	Proposed Claim Construction hearing <b>March 14, 2025, at 9:00 a.m.</b> at the Paul Brown United States Courthouse, 101 E. Pecan Street, Sherman, Texas 75090.	March 14, 2025		
<b>5 weeks after claim construction hearing</b>	(Fact Discovery deadline) Deadline for Initial Mandatory Disclosure of all persons, documents, data compilations and tangible things, which are relevant to a claim or defense of any party and which has not previously been disclosed.	April 18, 2025		
<b>28 days before service of expert reports</b>	Plaintiff to serve a Final Election of Asserted Claims, which shall identify no more than five asserted claims per patent from among the ten previously identified claims and no more than a total of 16 claims.		Plaintiff does not agree with adding this deadline or using the Model Order Focusing Patent Claims and Prior Art. Neither the Local Patent Rules nor the Court's Appendix B include this limitation.	April 4, 2025  This deadline is from the Court's Model Order Focusing Patent Claims and Prior Art and the Asserted Patents include over 100 patent claims.

Court Proposed Deadline	Event	Joint Proposed Date	OIT Proposed Date	Defendants Proposed Date
<b>Date for service of expert reports</b>	Defendants shall serve a Final Election of Asserted Prior Art, which shall identify no more than six asserted prior art references per patent from among the twelve prior art references previously identified for that particular patent and no more than a total of 20 references. For purposes of this Final Election of Asserted Prior Art, each obviousness combination counts as a separate prior art reference.		Plaintiff does not agree with adding this deadline or using the Model Order Focusing Patent Claims and Prior Art. Neither the Local Patent Rules nor the Court's Appendix B include this limitation.	May 2, 2025  This deadline is from the Court's Model Order Focusing Patent Claims and Prior Art and the Asserted Patents include over 100 patent claims.
<b>9 weeks after claim construction hearing</b>	Burden of Proof Expert Reports	May 2, 2025		
	Comply with P.R. 3-7. (Designation of Willfulness Opinions).	May 2, 2025		
<b>11 weeks after claim construction</b>	Rebuttal Expert Reports	June 6, 2025		

Court Proposed Deadline	Event	Joint Proposed Date	OIT Proposed Date	Defendants Proposed Date
<b>Objections to any expert, including Daubert motions, shall be filed within 3 weeks after the expert's Report has been disclosed. Such objections and motions are limited to ten pages each.</b>	Daubert Motions on Burden of Proof Expert reports	May 23, 2025		
	Close of Expert discovery	June 20, 2025		
<b>13 weeks after claim construction hearing (no later than 110 days prior to the filing of the Joint Final PTO)</b>	File Dispositive Motions and any other motions that may require a hearing. Regardless of how many dispositive motions a party files, each party is limited to a total of sixty pages for such motions. Each individual motion shall comply with Local Rule CV-7. Responses to motions shall be due in accordance with Local Rule CV-7(e).	July 3, 2025		

Court Proposed Deadline	Event	Joint Proposed Date	OIT Proposed Date	Defendants Proposed Date
<b>Objections to any expert, including Daubert motions, shall be filed within 3 weeks after the expert's Report has been disclosed. Such objections and motions are limited to ten pages each.</b>	Daubert Motion on Rebuttal Expert reports	July 3, 2025		
<b>5 weeks before final pretrial conf</b>	Notice of intent to offer certified records	September 19, 2025		
<b>5 weeks before final pretrial conf</b>	Counsel and unrepresented parties are each responsible for contacting opposing counsel and unrepresented parties to determine how they will prepare the Joint Final Pretrial Order and Proposed Jury Instructions and Verdict.	September 19, 2025		
<b>30 days before final pretrial conf</b>	Motions in limine due File Joint Final Pretrial Order. Exchange Exhibits and deliver copies to the court.	September 29, 2025		

Court Proposed Deadline	Event	Joint Proposed Date	OIT Proposed Date	Defendants Proposed Date
<b>4 weeks before final pretrial conf</b>	Deposition Designations due	October 6, 2025		
	Response to Deposition Designations	October 17, 2025		
<b>2 weeks before final pretrial conf</b>	Response to motions in limine due File objections to witnesses, deposition extracts, and exhibits, listed in pre-trial order. File Proposed Jury Instructions/Form of Verdict.  Notify court reporter to request daily copy of the transcript during trial	October 17, 2025		
<b>October 29, 2025</b>	Final Pretrial Conference at 10:00 a.m. at the Paul Brown United States Courthouse, 101 E. Pecan Street, Sherman, Texas 75090.	October 29, 2025 (set by Court)	Plaintiff requests the pretrial conference be rescheduled at least three weeks later as Plaintiff's counsel has a trial in another matter in N.D. Cal. beginning the week of October 27, 2025.	Defendants do not oppose Plaintiff's request that the pretrial conference be rescheduled at least three weeks later due to Plaintiff's counsel's trial in another matter in N.D. Cal. beginning the week of October 27, 2025

Court Proposed Deadline	Event	Joint Proposed Date	OIT Proposed Date	Defendants Proposed Date
TBD	10:00 a.m. Jury Selection and Trial at the Paul Brown United States Courthouse located at 101 East Pecan Street in Sherman, Texas.		November 17, 2025 or a date to be set by the Court (assumes 5 days jury trial for first trial)	A date to be set by the Court